

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**IN RE: INTERIOR MOLDED DOORS
INDIRECT PURCHASER ANTITRUST
LITIGATION**

Lead Case 3:18-cv-00850-JAG

**INDIRECT PURCHASER PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT WITH DEFENDANTS AND FOR
CONDITIONAL CERTIFICATION OF THE PROPOSED SETTLEMENT
CLASS**

Indirect Purchaser Plaintiffs ("IPPs"), on behalf of the proposed Settlement Class¹ by their class counsel ("Interim Co-Lead Class Counsel"), hereby move for an order pursuant to Fed. R. Civ. P. 23(1):

1. Granting preliminary approval of the Settlement Agreement;
2. Provisionally certifying the Settlement Class as proposed in the Settlement Agreement attached as Exhibit 1 to the Declaration of Hollis L. Salzman submitted herewith ("Salzman Declaration");
3. Authorizing IPPs to provide notice of the Settlement Agreement to Settlement Class Members at a later date as soon as practicable, in a form to be approved in advance by this Court;
4. Staying all proceedings against Defendants in this action;
5. Appointing the Plaintiffs as representatives of the Settlement Class; and

¹ Unless otherwise set forth herein, all defined terms shall have the same meaning as set forth in the Settlement Agreement executed on September 4, 2020.

6. Appointing Interim Co-Lead Class Counsel Robins Kaplan LLP, Gustafson Gluek PLLC, and Joseph Saveri Law Firm as Settlement Class Counsel and Willcox & Savage P.C. as Liaison Counsel for the Settlement Class.

IPPs submit that the Settlement Agreement represents a beneficial result to the Settlement Class. IPPs provide a description of the negotiation, benefits, and specifics of the Settlement Agreement in the Memorandum in Support of this Motion and in the Salzman Declaration.

The Parties have met and conferred and Defendants consent to the relief sought in this Motion.

WHEREFORE, based on the foregoing, and for the reasons set forth in the accompanying memorandum of law and Exhibits 1–2 attached to the Salzman Declaration, the Motion should be granted. A proposed form of order granting the relief sought by this Motion is included with this filing.

Dated: September 14, 2020

Respectfully submitted,

INDIRECT PURCHASER PLAINTIFFS

/s/

Conrad M. Shumadine (VSB #4325)

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*Interim Co-Lead Class Counsel for Plaintiffs and the Proposed Settlement Class
(admitted pro hac vice)*

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of September 2020, a copy of the foregoing document was filed electronically on the Court's Electronic Case Filing (ECF) system. A Notice of Electronic Filing (NEF) will be sent by operation of the Court's ECF system to the filing party, the assigned Judge, and any registered user in the case as indicated on the NEF.

To the best of my knowledge, there are no other attorneys or parties who require service by U.S. Mail.

/s/

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